EXHIBIT A

Case 2:17-cv-01546444 A Course of ASE 5 124 AP (12/17 Page 2 of 29





Case

County: **01** Case Number: **CV-2017-000196.00**

Court Action:

Style: WILLIE CHAMBLIN JR VS LIBERTY MUTUAL INSURANCE COMPANY

Real Time

Case Information

County: 01-JEFFERSON - Case Number: CV-2017-000196.00 Judge: EAF:ELISABETH A FRENCH

Style: WILLIE CHAMBLIN JR VS LIBERTY MUTUAL INSURANCE COMPANY

Filed: 06/05/2017 Case Status: ACTIVE Case Type: OTHER CV CASE

Trial Type: JURY Track: Appellate Case: 0

No of Plaintiffs: 1 No of Defendants: 1

Damages

Damage Amt: 0.00 Punitive Damages: 0.00 General Damages: 0.00

No Damages: Compensatory Damages: 0.00

Pay To: Payment Frequency: Cost Paid By:

Court Action

Court Action Code: Court Action Desc: Court Action Date:

Num of Trial days: 0 Num of Liens: 0 Judgment For:

Disposition Date of Appeal: Disposition Judge: : Disposition Type:

Revised Judgement Date: Minstral: Appeal Date:

Date Trial Began but No Verdict (TBNV1): Date Trial Began but No Verdict (TBNV2):

Comments

Comment 1: Comment 2:

Appeal Information

Appeal Date: Appeal Case Number: Appeal Court:

Appeal Status: Orgin Of Appeal:

Appeal To: Appeal To Desc: LowerCourt Appeal Date:

Disposition Date Of Appeal: Disposition Type Of Appeal:

Administrative Information

Transfer to Admin Doc Date: Transfer Reason: Transfer Desc:

Number of Subponeas: Last Update: 08/15/2017 Updated By: AJA

Settings

Settings

 Date:
 Que:
 Time:
 Description:

 3
 09/14/2017
 001
 01:00 PM
 HEAR - HEARING

Parties

Party 1 - Plaintiff INDIVIDUAL - CHAMBER WILLIE JR

Party Information Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 3 of 29

Party: C001-Plaintiff Name: **CHAMBER WILLIE JR I-INDIVIDUAL** Type:

LIBERTY MUTU D Hardship: Yes JID: **EAF** Index: Alt Name:

4825 YONDERHILL DRIVE (205) 000-0000 Address 1: Phone:

Address 2:

BIRMINGHAM City: ΑL Zip: State: **35207-0000** Country: US

DOB: SSN: Sex: Race:

Court Action

Court Action Date: Court Action:

Amount of Judgement: \$0.00 Court Action For: Exemptions: \$0.00 \$0.00 Cost Against Party: Other Cost: Date Satisfied: Comment: Arrest Date:

Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued Type: Reissue: Reissue Type: Issued: Return: Return Type: Return: Return Type: Service On: Served: Service Type Served By:

Answer Type: Notice of No Service: Notice of No Answer: Answer:

Attorneys

Attorney Code Type of Counsel Name Number **Email Phone**

000000 PRO SE Attorney 1

Party 2 - Defendant INDIVIDUAL - LIBERTY MUTUAL INSU<u>RANCE COMPANY</u>

Party Information

D001-Defendant Name: LIBERTY MUTUAL INSURANCE COMPANY **I-INDIVIDUAL** Party: Type:

CHAMBLIN WIL C Hardship: No JID: **EAF** Index: Alt Name:

100 CORPORATE PARKWAY (205) 000-0000 Address 1: Phone:

Address 2: **SUITE 225**

BIRMINGHAM ΑL City: State: Zip: **35242-0000** Country: US

SSN: DOB: Sex: Race:

Court Action

Court Action Date: Court Action:

Amount of Judgement: \$0.00 Court Action For: Exemptions: \$0.00 Cost Against Party: \$0.00 Other Cost: Date Satisfied: Comment:

Arrest Date:

Warrant Action Date: Warrant Action Status: Status Description:

Service Information

06/12/2017 Issued Type: C-CERTIFIED MAIL Reissue: Reissue Type: Issued: Return Type: Return Type: Return: Return: Served: 06/15/2017 Service Type A-AUTHORIZED SERVICE Service On: Served By:

Attorneys

Nullibel	Attorney Code	Type of Couriser	Name
Attorney 1	000000		PRO SE

Phone

Email

	Financial
I	Foo Shoot

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	AOCC	C001	000	\$6.59	\$6.59	\$0.00	\$0.00	0
ACTIVE	N	CV05	C001	000	\$306.00	\$0.00	\$306.00	\$0.00	0
ACTIVE	N	JDMD	C001	000	\$100.00	\$0.00	\$100.00	\$0.00	0
ACTIVE	N	MJDG	C001	000	\$50.00	\$0.00	\$50.00	\$0.00	0
ACTIVE	N	VADM	C001	000	\$45.00	\$0.00	\$45.00	\$0.00	0
				Total:	\$507.59	\$6.59	\$501.00	\$0.00	

Financial History

	Transaction Date	Description	Disbursement Accoun	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
ı	06/05/2017	RECEIPT	AOCC	2017173	8824970	\$6.59	C001	000		N			PDS

Case A	Action S	Summa	ary	
Date:	Time	Code	Comments	Operator
6/5/2017	12:52 PM	FILE	FILED THIS DATE: 06/05/2017 (AV01)	PDS
6/5/2017	12:53 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	PDS
6/5/2017	12:53 PM	ASSJ	ASSIGNED TO JUDGE: ELISABETH A FRENCH (AV01)	PDS
6/5/2017	12:53 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	PDS
6/5/2017	12:53 PM	TDMN	BENCH/NON-JURY TRIAL REQUESTED (AV01)	PDS
6/5/2017	12:53 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	PDS
6/5/2017	12:53 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	PDS
6/5/2017	12:53 PM	C001	C001 PARTY ADDED: CHAMBER WILLIE, JR. (AV02)	PDS
6/5/2017	12:53 PM	C001	INDIGENT FLAG SET TO: N (AV02)	PDS
6/5/2017	12:53 PM	C001	LISTED AS ATTORNEY FOR C001: PRO SE (AV02)	PDS
6/5/2017	12:53 PM	C001	C001 E-ORDER FLAG SET TO "N" (AV02)	PDS
6/5/2017	12:53 PM	D001	D001 PARTY ADDED: LIBERTY MUTUAL INSURANCE COMPANY	PDS
6/5/2017	12:53 PM	D001	INDIGENT FLAG SET TO: N (AV02)	PDS
6/5/2017	12:53 PM	D001	D001 E-ORDER FLAG SET TO "N" (AV02)	PDS
6/5/2017	12:55 PM	TDMJ	JURY TRIAL REQUESTED (AV01)	PDS
6/5/2017	12:57 PM	ESCAN	SCAN - FILED 6/5/2017 - CIVIL COVERSHEET	PDS
6/5/2017	12:58 PM	ESCAN	SCAN - FILED 6/5/2017 - AFFIDAVIT	PDS
6/5/2017	12:59 PM	ESCAN	SCAN - FILED 6/5/2017 - SUMMONS AND COMPLAINT	PDS
6/8/2017	9:38 AM	STYL	WILLIE CHAMBLIN, JR. VS LIBERTY MUTUAL INSURANCE C	KAH
6/8/2017	9:38 AM	STYL	OMPANY (AV01)	KAH
6/12/2017	11:54 AM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	KAH
6/12/2017	11:54 AM	D001	CERTIFIED MAI ISSUED: 06/12/2017 TO D001 (AV02)	KAH
6/12/2017	11:58 AM	C001	C001 NAME CHANGED FROM: CHAMBER WILLIE, JR. (AV02)	KAH
6/12/2017	11:58 AM	C001	INDIGENT FLAG SET TO: Y (AV02)	KAH

6/20/2017	9:35 AM	ESERC	SERVICE RETURN 0.2:17 ov 01556 MHH Document 1.1 Filed 00/12/17 Dage 5 of 20	MAM
6/20/2017	9:35 AM	D001	eservice of Authorized on objection of 15/2017 For Douglavoz) d 09/12/17 Page 5 of 29	MAM
7/28/2017	7:34 PM	NANS	NO ANSWER NOTICE ISSUED TO: D001 (V803)	PAS
8/4/2017	11:53 AM	EMOT	C001-DEFAULT JUDGMENT (\$50.00) FILED ON 8/1/2017 11:53 AM.	KAH
8/15/2017	3:40 PM	JEORDE	ORDER E-FILED - NOTICE OF HEARING - NOTICE OF HEARING - RENDERED & ENTERED: 8/15/2017 3:40:32 PM	
8/15/2017	3:41 PM	JEMOT	C001-DEFAULT JUDGMENT (\$50.00) /SET FOR 09/14/2017 01:00 PM, LOCATION = 610	
8/15/2017	3:41 PM	JESET	HEARING /SET FOR 9/14/2017 1:00 PM	
8/15/2017	3:41 PM	DAT3	FOR: HEARING ON 09/14/2017 @ 0100P (AV01)	AJA
8/31/2017	3:47 PM	JEORDE	ORDER E-FILED - RESCHEDULE HEARING IN TIME ONLY - RESCHEDULE HEARING IN TIME ONLY - RENDERED & ENTERED: 8/31/2017 3:47:11 PM	



END OF THE REPORT

CV201700196

State of Alabama			Case Number					
Unified Judicial System	COVERS		C V					
Form ARCiv-93 Rev.5/99	CIRCUIT COURT (Not For Domestic I		Date of Filing: Judge Code: Month Day Year					
	GEN	NERAL INFORMA	TION					
IN THE CIRCUIT COURT	of a lefters	64V	, ALABAMA					
Willie ("holmbel	(Name)	of county) the track Inchrance					
First Plaintiff Busin Gover	Plaintiff ess Individual mment Other	First Defenda	nt Business Individual Government Other					
NATURE OF SUIT: Selec	t primary cause of action, b	y checking box (check	only one) that best characterizes your action:					
TOWA - Wantonness TOPL - Product Lial TOMM - Malpractice- TOLM - Malpractice- TOOM - Malpractice- TOOM - Malpractice- TOOM - Fraud/Bad I TOXX - Other: TORTS: PERSONAL INJURY TOPE - Personal P TORE - Real Proper OTHER CIVIL FILINGS ABAN - Abandoned ACCT - Account & I APAA - Administrati	eath General : Motor Vehicle s bility/AEMLD Medical Legal -Other Faith/Misrepresentation roperty urly d Automobile Nonmortgage ive Agency Appeal ve Procedure Act	COND - Cond CTMP - Conte CONT - Conte CONT - Conv COND - Equit Ele CVUD - Evicti FORJ - Forei FORF - Fruit MSHC - Habe PFAB - Prote PFAB - Prote RPRO - Real WTEG - Will/T COMP - Work	(cont'd) Death Certificate Modification of Figure 1 per light cement of Agency Subpoend Petition to Fresh (Continued of Agency Subpoend Petition to Fresh (Continued of Agency Subpoend Petition to Fresh (Continued of Agency Suppoend Petition (Continued of Agency					
	eed of Protective Services INITIAL FILING	A ☐ APPEAL FRO	M o□ other:					
,	REMANDED	DISTRICT COL T TRANSFERRE OTHER CIRCUI	JRT					
HAS JURY TRIAL BEE	N DEMANDED? DY	es 🗆 no No	te: Checking "Yes" does not constitute a demand for a y trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)					
RELIEF REQUESTED:	MONETARY AWARE	REQUESTED	NO MONETARY AWARD REQUESTED					
ATTORNEY CODE:] <u>8-5</u>	- 17	Signature of Attorney/Party filing this form					
MEDIATION REQUEST	ED: YES NO [Date Signature of Attorney/Party filing this form MEDIATION REQUESTED: YES NO UNDECIDED						

SATURA DAVO COME

State of Alabama Unified Judicial System	AFFIDAVIT	COF SUBS	STANTIAL	d Case Number 00196
Form C-10 Page 1 of 2 Rev.2/95	HARDSI	HIP AND	ORDER	
IN THE		URT OF		, AĻABAMA
STYLE OF CASE:	Municipal) Aamle Plaintiff(s)	lyg.	(Name of County or Muni	nouted Mendant(s)
TYPE OF PROCEEDING:		_CHARGE(s) (if	applicable):	
CIVIL CASE I, because of s that payment of these fees be w				vice fees in this case. I request
CIVIL CASE- (such as paters attorney and I request that the c		n of parental rig	hts, dependency) - I	am financially unable to hire an
CRIMINAL CASE I am financia		rney and request	war webb ab aldook	FICO me.
DELINQUENCY/NEED OF SUI one for my child/me	PERVISION I am finan	cially unable to I	it CANCOLL CALAIT IS	4WSION the court appoint
one of my character	· · · · · · · · · · · · · · · · · · ·		JUN 05 2	117
SECTION 1		AFFIDAVIT	1	1
1. IDENTIFICATION Full name	Chamles)	ANNE-MARIE / CLERK	317 110
Spouse's full name (if married)		A = n : 0 A		Ast bear and a second and a second as a
Complete home address	gas you		700	
Number of people living in househ		00		
Home telephone number Occupation/Job	>\$ 7 & 1 4	ath of employment	N DEMONS OF PARTIES	
	Redacted	*Social Secur	ity Number Reda	acted 3/4 6
		Employer's tel	ephone number	
Employer's address				
ASSISTANCE BENEFITS Do you or anyone residing in apply)	your household receive	benefits from any	of the following source	s? (if so, please check those which
AFDC Food Stamps 3. INCOME/EXPENSE STATEMENT		dicaid 🔲 Ot	her	
Monthly Gross Income:		m.	2400.00	Marie American States S
Monthly Gross Income Spouse's Monthly Gross Inco		e) :	aluviuu	
Other Earnings: Commission Contributions from Other Pec		, etc,		
Unemployment/Workmen's C Social Security, Retiremen		:		
Other Income (be specific)	Secretary Simons Community of the Commun			711
TOTAL N	MONTHLY GROSS INCOME			\$ 400.00
Monthly Expenses:			· \$25.00	
A. Living Expenses Rent/Mortgage			300.00	•
Total Utilities: Gas, Electric Food	city, Water, etc		- 358.88	
Clothing Health Care/Medical			330,00	
Insurance Car Payment(s)/Transporta	ation Expenses		336100	
Loan Payment(s)	·		5 56000	
*OPTIONAL				

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 8 of 29

CV201700196

		<u> </u>	
Form C-10 Page 2 of 2 Rev.2/95	AFFIDAVIT	OF SUBSTANTIAL HAI	RDSHIP AND ORDER
Monthly Expenses:(cont	d page1)		
Credit Card Paym Educational/Empl		· · · · · · · · · · · · · · · · · · ·	
Other Expenses (be specific)		
		· ·	
Sub	p-Total		A \$
B. Child Support Par	vment(s)/Alimony	\$	A.F. 1.
. ,	b-Total	*	B \$
C. Exceptional Expe	enses	\$	
TOTAL	. MONTHLY EXPENSES (add subtot	als from A & B monthly only	\$ 33,20.00
Total Gross Month	ly Income Less total monthly ex	penses:	
· · · · · · · · · · · · · · · · · · ·	DISPOSABLE MONTHLY INC	OME	\$
4. LIQUID ASSETS:		:	i.e., eest
Cash on Hand/Bani	(or otherwise available such as stock	s,	FILED IN OFFICE
bonds, certificates of Equity in Real Esta	deposit) Ite (value of properly less what you ow	\$ >)	CIRCUIT CIVIL DIVISION
Equity in Personal	Property, etc. (such as the value of	. ,	
motor vehicles, ste guns, less what you	reo, VCR, furnishing, jewelry, tools,		JUN 0 5 2017
Other (be specific)			
Do you own anythii	ng else of value? ☐ Yes ☑No TV, stereo, jewelry)		ANNE-MARIE ADAMS
If so, describe	TV, Stereo, jeweny)	··········	CLERK
	TOTAL LIQUID ASSETS	<u>: </u>	\$
any question in the affic records of information understand and acknow	lavit may subject me to the penaltie pertaining to my financial status f vledge that, if the court appoints an of my court-appointed counsel,	s of perjury, I authorize the come any source in order to attorney to represent me, the Affiant's Signa	= Chamblin JR.
Judge/Clerk/(Notary		Print or Type	Name -
MY COMMISSION EXPIRES D	ECEMBER 13, 2019	R OF COURT	
SECTION II	DERED, AND ADJUDGED BY THE CO	NIDT AC COLLOWS	
200 600 000	•	IUKT AS FOLLOWS:	
☐ Affiant is partially in			erefore defendant is ordered to pay e paid to the clerk of court or as otherwise
	request is GRANTED.	-	
The prepayment of	docket fees is waived.		
IT IS FURTHER ORDE	RED AND ADJUDGED that		is hereby appointed as counsel to represent
affiant. IT IS FURTHER ORDE	·	rt reserves the right and ma	ay order reimbursement of attorney's fees and
•	-	•	1/2
			70/
		Judge	

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 9 of 29

State of Alabam Unified Judicial		SUMMONS	C V 20 700 196
Form C-34	Rev. 7/2016	-CIVIL-	
IN THE	uit District or Juvenil		COUNTY, ALABAMA
	[Name(s) of Play	atif(s)] V	[Name(s) of Defendant(s)]
NOTICE TO	dillere	y Mittual Moura	no 100 Corporale part way
YOU MUST T REQUIRED TO ALLEGATION YOUR ANSWE	AKE IMMEDIA FILE THE ORI IN THE COMPL R MUST BE MA	DOCUMENT WHICH IS ATTACHED TE ACTION TO PROTECT YOUR RI GINAL OF YOUR WRITTEN ANSWER, AINT OR OTHER DOCUMENT, WITH TED OR HAND DELIVERED BY YOU	TO THIS SUMMONS IS IMPORTANT, AND IGHTS YOU OR YOUR ATTORNEY ARE EITHER ADMITTING OR DENYING EACH THE CLERK OF THIS COURT. A COPY OF THE PLAINTIFF(S) CIRCUIT CIVIL DIVISION WHOSE
ADDRESS(ES) 1	IS/ARE:		JUN 05 2017
		[Address(es) of Plaintiff(s) or Attorney(s)	ANNE-MARIE ADAMS
COMPLAINT O	OR OTHER DO		DAYSCLERKTER THIS SUMMONS AND OR A JUDGMENT BY DEFAULT MAY BE DEMANDED IN THE COMPLAINT OR OTHER
TO ANY	SHERIFF OR	ANY PERSON AUTHORIZED BY PROCEDURE TO SERVE	THE ALABAMA RULES OF CIVIL PROCESS:
	hereby comma on the above-na		y of the Complaint or other document in
		of this Summons is initiated upon the	
pursuant to the	Walaboma Rules	of Civil Procedure me - Mane	By:
	(Date)	(Signati	ne of Clerk)
☐ Certifie	d Mail is hereby	requested. (Plaintiff's 4uorney s S	ignature)
		RETURN ON SERVICE	E
☐ Return r	eceipt of certific	ed mail received in this office on	
☐ I certify	that I personally	delivered a copy of this Summons and	d Complaint or other document to
	(Name)	in(Name of C	County,
Alabama		·	
(Type of Pro	ocess Server)	(Add) ess (of Server)
		(Phone Nu	umber of Sen cri

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 10 of 29

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3 Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits Article Addressed to Liberty Mutual Insurance 100 Corporate Parkway Suite 228 	A Signature X
Birmingham, Alabama 35242 CV2017-000196 D001 9590 9401 0050 5148 0551 54 Article Number (Transfer from service label) 7014 1970 0000 8954 305	3 Service Type
PS Form 3811, April 2015 PSN 7530-02-000-9053	Domestic Return Receipt

U.S. Postal Service^{Im} CERTIFIED MAIL® RECEIPT Domestic Mail Only For delivery information, visit our website at www.usps.com* Certified Mail Fee The Services & Fees (chack kex, and fee as appropriate) Return Receipt (sectorary) Return R

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

CIVIL ACTION NUMBER: <u>CV201700196</u>

WILLIE CHAMBLIN, JR.,

Plaintiff,

VS.

FILED IN OFFICE CIRCUIT CIVIL DIVISION

JUN 05 2017

ANNE-MARIE ADAMS CLERK

LIBERTY MUTUAL INSURANCE COMPANY, a Annuance corporation licensed to do business in the State of Alabama; No. 1, whether singular or plural, that entity or those entities, other than those entities described above, whose misrepresentations, fraud or other wrongful conduct contributed to cause the occurrence made the basis of this lawsuit; No. 2, whether singular or plural, that entity, those entities or individuals being the person, firm, or corporation who breached any of the contracts with the Plaintiff as described herein; No. 3, whether singular or plural, that entity, those entities or individuals being the person, firm, or corporation, other than those individuals and entities described above, whose negligence, wantonness, and/or other wrongful conduct contributed to cause the occurrence made the basis of this lawsuit; No. 4, whether singular or plural, that entity or those entities, other than those entities described above whose conduct contributed in any way to the damaged caused to the Plaintiff; No. 5, whether singular or plural, the entity or entities, other than those entities described above, which is a successor in interest of any of those entities described above. Plaintiff aver that the identities of the fictitious party defendants herein are otherwise unknown to the Plaintiff at this time or if their names are known to the Plaintiff, their identities as proper party defendants are not known to the Plaintiff at this time, but their true names will be substituted by amendment when the aforesaid lacking knowledge is ascertained,

Defendants.

SUMMONS

This service by certified mail of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

Liberty Mutual Insurance Company

c/o

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 12 of 29

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written answer, either admitting or denying each allegation in the Complaint, to

Willie Chamblin

THE RETURN RECEIP YOU FOR THE MONE	BE MAILED OR DELIVERED WITHIN THIRTY ERY OF THIS SUMMONS AND COMPLAINT A PT, OR A JUDGMENT BY DEFAULT MAY BE ENTY OR OTHER THINGS DEMANDED IN THE COMPUT Answer with the Clerk of this Court within a reason	S EVIDENCED BY NTERED AGAINST
X The service by cerpursuant to Rule 4.1(c) o	tified mail of this summons is initiated upon the writtenf the Alabama Rules of Civil Procedure.	n request of plaintiff
	BY:	
DATE	CLERK/REGISTER	**************************************
	RETURN ON SERVICE:	
Certified Mail retu hereto attached.)	urn receipt received in this office on (Date)	(Return receipt

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

CIVIL ACTION NUMBER: [V201700196

WILLIE CHAMBLIN, JR.,

Plaintiff,

VS.

FILED IN OFFICE CIRCUIT CIVIL DIVISION

JUN 05 2017

ANNE-MARIE ADAMS

LIBERTY MUTUAL INSURANCE COMPANY, a An Alinance corporation licensed to do business in the State of Alabama; No. 1, whether singular or plural, that entity or those entities, other than those entities described above, whose misrepresentations, fraud or other wrongful conduct contributed to cause the occurrence made the basis of this lawsuit; No. 2, whether singular or plural, that entity, those entities or individuals being the person, firm, or corporation who breached any of the contracts with the Plaintiff as described herein; No. 3, whether singular or plural, that entity, those entities or individuals being the person, firm, or corporation, other than those individuals and entities described above, whose negligence, wantonness, and/or other wrongful conduct contributed to cause the occurrence made the basis of this lawsuit; No. 4, whether singular or plural, that entity or those entities, other than those entities described above whose conduct contributed in any way to the damaged caused to the Plaintiff; No. 5, whether singular or plural, the entity or entities, other than those entities described above, which is a successor in interest of any of those entities described above. Plaintiff aver that the identities of the fictitious party defendants herein are otherwise unknown to the Plaintiff at this time or if their names are known to the Plaintiff, their identities as proper party defendants are not known to the Plaintiff at this time, but their true names will be substituted by amendment when the aforesaid lacking knowledge is ascertained,

Defendants.

COMPLAINT

Parties and Venue

1. Plaintiff, Willie Chamblin, Jr., is a resident of Jefferson County, Alabama and is over nineteen (19) years of age.

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 14 of 29

2. Defendant, Liberty Mutual Insurance Company, (hereinafter "Liberty") is a <u>Mounane</u> corporation doing business in the State of Alabama.

Facts

- 3. Plaintiff alleges, re-asserts and incorporates by reference paragraphs 1 through 2 as if set out herein in full.
- 4. At the time of the loss referred to in this Complaint and at all times material thereto,

 Liberty carried homeowner's insurance on the Plaintiff's home located at 4825 your left of
- 5. Plaintiff avers said policy provided coverage for damages suffered as a result of a tornado which occurred on 4-27-// which caused Plaintiff to have to vacate his home.
- 6. Plaintiff submitted a claim to Liberty for the damages sustained to the above property on or about 4-38-1/
- That Plaintiff and Defendant entered into an agreement that was intended to make
 Plaintiff whole.
- 8. Plaintiff avers that Defendant has failed to abide by the agreement, which constitutes policy fraud.
- 9. Defendant, Liberty, entered into a contact, via a policy of insurance, with Plaintiff and Liberty breached said contract. Pursuant to the terms and conditions of the Plaintiff's contract, tornado damage is a covered peril. The Plaintiff's home became damaged, Liberty's refused to extend payment for the damage under the terms and conditions of the contract. Liberty refused to pay for all the damage and would only agree to pay for certain parts of the damage.

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Chamblin v. Liberty, et al

Complaint

Page Two

10. As a result of the breach of contract, and other wrongful conduct of these defendants,

the Plaintiff was injured and damaged.

11. Plaintiff maintains that Liberty had a duty imposed on it by law to exercise good faith

and fair dealings in the performance of their contractual obligations under the terms and conditions

of the aforesaid policy of insurance.

12. Liberty acted in bad faith and as a result of the Defendants' reckless, negligent and/or

wanton actions, the Plaintiff was injured and damaged.

13. The above described conduct is part of a pattern, practice, artifice, scheme, combination

and conspiracy by Defendants to deprive the Plaintiff and similarly situated policyholders of benefits

pursuant to similar policies of insurance.

14. As a result of Defendants reckless, negligent and/or wanton conduct, the Plaintiff was

injured and damaged.

WHEREFORE, PREMISES CONSIDERED, Plaintiff demands judgment against each

of the defendants, jointly and severally, in an amount to be determined by a jury, together with

interest from the date of loss, and the costs of this proceeding.

Respectfully submitted,

Tham bling

Willie Chamblin, Jr.

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 16 of 29

Chamblin v. Liberty, et al Complaint Page Three

PLAINTIFF DEMANDS TRIAL BY STRUCK JURY.

Willie Chamblin, Jr.

Plaintiff's Address:

SERVE DEFENDANTS VIA CERTIFIED MAIL AS FOLLOWS:

Liberty Mutual Insurance Company c/o

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.
- 1. Article Addressed to:

Liberty Mutual Insurance 100 Corporate Parkway Suite 228 Birmingham, Alabama 35242

CV2017-000196 D001

2 Article Number (Transfer from service label)

7016 1970 0000 8954 3051

COMPLETE THIS SCUTIVITY ON DELIVERY				
A.	Signature /	/.'		
٧	1 / 6	☐ Agent		
<u>^</u>	<u> </u>	Addressee		
В,	Received by (Printed Name)	C, Date of Delivery		
		6-15-17		
D'	Is delivery address different from ite	m 17 🗆 Yes 📝		
	If YES, enter delivery address belo	w: 🔲 No		

3. Service Type

E Adult Signature

☐ Adult Signature Restricted Delivery

Collect on Delivery

Collect on Delivery Restricted Delivery

1 Mail Mail Restricted Delivery ☐ Priority Mail Express®

□ Registered Mail™

☐ Registered Mail Restricted

Fleturn Receipt for Merchandise

☐ Signature Confirmation™

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01-CV-2017-000196.00

Judge: ELISABETH A FRENCH

To: CHAMBER WILLIE JR (PRO SE) 4825 YONDERHILL DRIVE BIRMINGHAM, AL, 35207-0000

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

WILLIE CHAMBLIN JR VS LIBERTY MUTUAL INSURANCE COMPANY 01-CV-2017-000196.00

The following matter was served on 6/15/2017

D001 LIBERTY MUTUAL INSURANCE COMPANY

Corresponding To

AUTHORIZED SERVICE

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203

nte of Alabama fied ,fudicial System	APPLICATION AN	D VERIDAAT	ENT CHARLERING		
rm C-25A Rev. 6/07	ENTRY OF DEFA	AULT JUDGMI	ENT (V201700196		
	COURT	r OF	, ALABAMA		
THE			ne of County)		
Wille Cha	uit or Pistrict) .MDI ', W	L.berty Mutu	Defendant		
	Plaintiff ne ☐ clerk of court, or ☑ judge, puert against the above - named def	ursuant to Rule 55(b), Alab endant,* in the above case	nama Rules of Civil Procedure (ARCP) for the defendant's failing to plead,		
	(3)	t	eing duly swom, states as follows		
1 That the affiant has pers	sonal knowledge of the facts set forth in served with a summons and a copy of days have elapsed since the defe	the affidavit the Statement of Claim/Compl	aint on (date) 6-13-1		
2 That the defendant was	served with a summons and a copy of	ndant was served with a sum	mons and a copy of the Statement of		
4 That the defendant has	s failed to answer or otherwise defend as	painst the plaintitl's Statement	oose of enabling the plaintiff to obtain a		
5 That this affidavit is exe	s failed to answer or otherwise defend as ecuted by the affiant in accordance with	aling to answer or otherwise d	afend against the plaintiff's Statement of		
default judgment ager	ust the deletionist to all assure	L ve suefaha	of the provisions of Ala Code 1975,		
6 That the defendant is f	not an infant or an incompetent person, a	and there has been no violation i	FILED IN OFFICE		
Chapter 19, Title 5	EA In military convice		CIRCUIT CIVIL DIVISION		
a sudament Conditions	I I MILL I SITABILIONI MSIABI OL EVININE	16			
			AUG 0 1 2017		
FATHE SUM OF \$	725, 000,0 Which is to be deter	milled as iolions	A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
Principal Balance \$_ Interest \$_		ney's fees, it must be determin	ANNE-MARIE ADAMS		
Attorney Fee \$	(if requesting attorn	ney's fees, it must be determine	CLERK		
(If provided by con	tract, note or law)		and a state acceptance from the		
SPECIFY PROPERTY (Describe, on a separate sheet of paper, property of which the plaintiff demanded right to possession from defendant in the Statement of Claim/Complaint)					
10 The affiant requests e	entry of judgment. By the Court	Name of Affiant	Lille Chamblin		
10 Life differing residence .	By the Clerk	Signature of Afflant	Address (if not represented by an attorney)		
Sworn To and Subscribe	d Sefore Me This	Affiant's Home or Business :	Address (ii Not represent		
Sworn to said shows	*17	Brkan a	35207		
They -	H P I Fail	City State	Zip Code		
Median (LAX NOTARY	Name of Attorney			
Oncer's Signature	()	Signature of Attorney			
Motory	= 1 1 12001	Business Address of Attor	ney		
My Commess	in Exp June 1, 2021	City State	Zıp Code		
//	ereby rendered against the defendant in	the amount of \$			
Detault logdweur is re	and the many and any				
Date Date Default judgment is hereby rendered against the defendant and the plaintiff is awarded right to posession of the property sworn to in the property sworn to interpret sword sworn to interpret sworn to i					
Default judgment is he affidavit above	ereby rendered against the defendant at				
Dota		Judge/Clerk			
Date	CERTIFICATE OF SERV	VICE ON OTHER PARTIES	Canna		
I hereby certify that a cop sent, by first class mail, p	by of this Application, Affidavit, and Entry coosinge prepaid, to all parties who are not in	of trafault hidoment has been	Signed		
Rule 55, ARCP * Separate form shall be	completed for each defendant in cas 1975, §12-19-71(a) (10), a filing fee is				
Pulsualit to File	Copy - Plaintiff	Copy - De	tendant		

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17 Page 21 of 29

STATE OF ALABAMA Revised 3/5/08 Unified Judicial System	Case No
District Court Court	it Court (CV201711196
	CIVIL MOTION COVER SHEET
Style of case	lame of Filing Party
"Liberty Mutual INS"	
Name, Address, and Telephone No of Attorney or Party (If Not Represe	onted) Oral Arguments Requested
Attorney Bar No	
the state of the s	F MOTION Metions Not Beguring Eco
Motions Requiring Fee	Motions Not Requiring Fee
Default Judgment (\$50 00) Joinder in Other Party's Dispositive Motion (i e	Add Party
Summary Judgment, Judgment on the Pleadings, or other Dispositive Motion not pursuant to Rule 12(b)) (\$50 00)	Change of Venue/TransferCIRCUIT CIVIL DIVISION
Judgment on the Pleadings (\$50 00)	Consolidation AUG 0.1 2017
Motion to Dismiss, or in the Alternative Summary	Deposition ANNE-MARIE ADAMS
☐ Judgment(\$50 00) Renewed Dispositive Motion(Summary Judgment, ☐ Judgment on the Pleadings, or other Dispositive	Designate a Mediator Judgment as a Matter of Law (during Trial)
Motion not pursuant to Rule 12(b)) (\$50 00)	☐ Disburse Funds ☐ Extension of Time
Summary Judgment pursuant to Rule 56(\$50 00)	In Limine
☐Motion to Intervene (\$297 00)	Joinder Mars Definite Statement
	More Definite Statement Motion to Dismiss pursuant to Rule 12(b)
Other	☐New T⊓al
pursuant to Rule(\$50 00)	Objection of Exemptions Claimed
*Motion fees are enumerated in §12-19-71(a) Fees pursuant to Local Act are not included. Please contact the	Pendente Lite Plaintiff's Motion to Dismiss
Clerk of the Court regarding applicable local fees	☐ Preliminary Injunction
Local Court Costs \$	Protective Order
	Quash
	Release from Stay of Execution Sanctions
	Sever
	Special Practice in Alabama
	☐ Stay
	Supplement to Pending Motion
	☐ Vacate or Modify
Hearing Date	Withdraw
A Die Chamlel	Other pursuant to Rule (Subject to Filing Fee)
Check here if you have filed or are filing Date	Signature of Attorney or Party
contemoraneously with this motion an Affidavit of Substantial Hardship or if you are filing on behalf of an agency or department of the State, county, or municipal	
gency or department or the State, county, or municipal government (Pursuant to §6-5-1 Code of Alabama (1975), governmental entities are exempt from prepayment of filing fees)	- 17

This Cover Sheet must be completed and submitted to the Clerk of Court upon the filing of any motion. Each motion should contain a separate Cover Sheet

^{**}Motions titled 'Motion to Diamiss' that are not pursuant to Rule 12(b) and are in fact Motions for Summary Judgments are subject to filing fee

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17

ELECTRONICALLY FILED
Page 22,05,26017 3:40 PM
01-CV-2017-000196.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
ANNE-MARIE ADAMS, CLERK

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

)
)
) <u>CASE NO. CV 17-196-EAF</u>
)
)

ORDER

The Plaintiff's Application and Affidavit for Entry of Default Judgment is set for oral argument on **September 14, 2017, at 1:00 a.m.** in Room 610, Jefferson County Courthouse, 716 North Richard Arrington Jr. Blvd., Birmingham, Alabama 35203. The Plaintiff shall be prepared to prove damages at sad hearing.

DONE and ORDERED this 15th day of August, 2017.

/s/ Elisabeth A. French ELISABETH A. FRENCH CIRCUIT JUDGE

EAF/pc

cc: Willie Chamblin

4825 Yonderhill Drive

Birminigham, Alabama 35207

Liberty Mutual Insurance 100 Corporate Parkway, Suite 228 Birmingham, Alabama 35242



01-CV-2017-000196.00

Judge: ELISABETH A FRENCH

To: CHAMBER WILLIE JR (PRO SE) 4825 YONDERHILL DRIVE BIRMINGHAM, AL, 35207-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

WILLIE CHAMBLIN JR VS LIBERTY MUTUAL INSURANCE COMPANY 01-CV-2017-000196.00

The following matter was FILED on 8/15/2017 3:40:38 PM

Notice Date: 8/15/2017 3:40:38 PM

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203



01-CV-2017-000196.00

Judge: ELISABETH A FRENCH

To: LIBERTY MUTUAL INSURANCE COMPANY (PRO SE)
100 CORPORATE PARKWAY
SUITE 225
BIRMINGHAM, AL, 35242-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

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BIRMINGHAM, AL, 35203



01-CV-2017-000196.00

Judge: ELISABETH A FRENCH

To: CHAMBER WILLIE JR (PRO SE) 4825 YONDERHILL DRIVE BIRMINGHAM, AL, 35207-0000

NOTICE OF CASE SETTING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

WILLIE CHAMBLIN JR VS LIBERTY MUTUAL INSURANCE COMPANY 01-CV-2017-000196.00

The following matter was SET FOR HEARING

C001 CHAMBER WILLIE JR

MOTION FOR DEFAULT JUDGMENT

[Filer: PRO SE]

Hearing Date: 09/14/2017 Hearing Time: 01:00:00 PM

Location: 610

Notice Date: 8/15/2017 3:41:31 PM

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203



01-CV-2017-000196.00

Judge: ELISABETH A FRENCH

To: LIBERTY MUTUAL INSURANCE COMPANY (PRO SE)
100 CORPORATE PARKWAY
SUITE 225
BIRMINGHAM, AL, 35242-0000

NOTICE OF CASE SETTING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

WILLIE CHAMBLIN JR VS LIBERTY MUTUAL INSURANCE COMPANY 01-CV-2017-000196.00

The following matter was SET FOR HEARING

C001 CHAMBER WILLIE JR

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JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203

Case 2:17-cv-01556-MHH Document 1-1 Filed 09/12/17

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2 8/31/2017 3:47 PM

01-CV-2017-000196.00

CIRCUIT COURT OF

JEFFERSON COUNTY, ALABAMA
ANNE-MARIE ADAMS, CLERK

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

WILLIE CHAMBLIN,)
Plaintiff,)
v.) CASE NO. CV 17-196-EAF
LIBERTY MUTUAL INSURANCE,)
Defendant.)

ORDER

The hearing previously set for September 14, 2017, at 1:00 p.m. is rescheduled in time only to **September 14, 2017, at 1:45 a.m.** in Room 610, Jefferson County Courthouse, 716 North Richard Arrington Jr. Blvd., Birmingham, Alabama 35203.

DONE and ORDERED this 31st day of August, 2017.

/s/ Elisabeth A. French ELISABETH A. FRENCH CIRCUIT JUDGE

EAF/pc

cc: Willie Chamblin

4825 Yonderhill Drive

Birmingham, Alabama 35207

Liberty Mutual Insurance 100 Corporate Parkway, Suite 228 Birmingham, Alabama 35242



01-CV-2017-000196.00

Judge: ELISABETH A FRENCH

To: CHAMBER WILLIE JR (PRO SE) 4825 YONDERHILL DRIVE BIRMINGHAM, AL, 35207-0000

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WILLIE CHAMBLIN JR VS LIBERTY MUTUAL INSURANCE COMPANY 01-CV-2017-000196.00

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JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203



01-CV-2017-000196.00

Judge: ELISABETH A FRENCH

To: LIBERTY MUTUAL INSURANCE COMPANY (PRO SE)
100 CORPORATE PARKWAY
SUITE 225
BIRMINGHAM, AL, 35242-0000

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